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FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
 )  
Revision of the Commission's Rules ) CC Docket No. 94-102  
to ensure compatibility with enhanced )  
911 emergency calling systems )

To: The Commission

DOCKET FILE COPY ORIGINAL

Comments of the Rural Cellular Association

The Rural Cellular Association ("RCA"), pursuant to Section 1.415 of the Commission's Rules,<sup>1</sup> hereby submits the following Comments in response to the Public Notice in this docket released by the Commission on February 16, 1996. Pursuant to the Public Notice, the Commission seeks additional comment in the captioned proceeding on the ex parte presentation titled "Public Safety-Wireless Industry Consensus: Wireless Compatibility Issues, CC Docket 94-102."<sup>2</sup> Contrary to the implication of its name, this "Consensus Agreement" does not represent an all-inclusive industry position because it ignores the well-documented concerns<sup>3</sup> of the

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<sup>1</sup>/ 47 C.F.R. § 1.415.

<sup>2</sup>/ "Public Safety-Wireless Industry Consensus: Wireless Compatibility Issues, CC Docket 94-102," filed by CTIA, NENA, APCO, and NASNA on February 13, 1996 ("Agreement").

<sup>3</sup>/ See Comments of the Rural Cellular Association, filed January 9, 1995, and Reply Comments of the Rural Cellular Association, filed March 17, 1995, In the Matter of Revision of the Commission's Rules to ensure compatibility with enhanced 911 emergency calling systems, CC Docket No. 94-102; and Comments of the Rural Cellular Association In the Matter of Petition for Rulemaking of the Ad Hoc Alliance for Public Access to 911, CC Docket No. 94-102, filed December 15, 1995.

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RCA member companies with respect to the special problems of implementing E-911 in rural areas.<sup>4</sup> To clarify the record, therefore, RCA reiterates its position on specific issues addressed in the Agreement.

In general, the Agreement fails to address the fact that there is no national uniformity with respect to the technical capability of the recipients of E-911 information, the local emergency service providers. In many areas of the country, not even landline telephone subscribers have access to E-911 services. Consequently, it is premature to mandate national deployment of mobile E-911 capabilities. At a minimum, implementation policies must recognize that a safe-harbor mechanism is appropriate -- cellular providers serving rural jurisdictions must be afforded a reasonable time frame for implementation after the local emergency service provider has deployed the technology to receive E-911 information.

With respect to the specifics of the Agreement, the "Phase I" (calling party number) implementation proposal may prove meaningless and misleading in rural areas. RCA has noted previously that although many systems currently are capable of providing cell site information, there exist logistical difficulties in ensuring that the information is, in fact, useful. For example, cell site service areas do not necessarily correspond

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<sup>4</sup>/ RCA was not a party to the Agreement, nor was it afforded the opportunity to present its position to the parties to the Agreement prior to its presentation to the Commission.

to public safety answering point ("PSAP") response areas, and there is often significant overlap among jurisdictions.

The Agreement's new Phase II proposal to implement within five years the ability to locate, in latitude and longitude, a wireless caller within 125 meters Root Mean Square is also troubling for rural areas. It is critical that the Commission recognize that there exist fundamental technical barriers to the provision of location information in rural areas. As RCA has previously described in this proceeding, the concerns regarding this proposal are more than simply an "implementation issue," as suggested by the Agreement.

For example, RCA is concerned that the triangulation technique required by most Automatic Location Information ("ALI") technologies simply cannot be performed in many rural systems. The triangulation technique requires the existence of three densely erected, overlapping cell sites. Most rural systems are engineered and constructed with utmost attention to efficiency such that a mobile customer is never within range of three different cell sites at the same time. To the extent that there even exist three sites in large rural service areas, the wide geographic separation of the sites often makes it impossible to provide information accurate within the proposed 125-meter standard. Plainly stated, the 125-meter standard simply cannot be met in rural areas.

Of more general applicability, it should also be noted that triangulation techniques, by definition, provide locational information only with respect to locations within the "triangle." Unless cells are sited on market boundaries (which is true only in very few circumstances), triangulation locational techniques will be useless in locating mobile users in vast areas within each market in the United States. Even if neighboring systems were to enter cooperative arrangements in partial answer to this dilemma, the broader question of how the lack of nation-wide uniformity in technology will affect carriers' ability to locate roamers is not addressed.

In addition, other general technical difficulties pose significant problems, including issues regarding customer equipment. For example, carrier implementation of base station modifications will mean very little if customer equipment is not also correspondingly modified. Where customers are unwilling to change out their equipment, either because of price or technical limitations of the new equipment,<sup>5</sup> the carrier's investment is simply wasted. Moreover, when additional costs, whether in the form of excise taxes or amortized carriers' expenses, render the

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<sup>5/</sup> RCA understands that not only is modified CPE relatively expensive, but also that the transmission of locational information results in rapid battery drains, thereby compromising the ability to continue communication with a person in an emergency situation. In this regard, therefore, the relative utility of locational information is suspect, and provides additional support for RCA's basic questions regarding the relative costs and benefits of locational information.

service itself uneconomical to subscribers, the undeniable public health and safety benefits of access to mobile communications is undermined.

While RCA notes with concurrence the Public Safety Communicators' recognition that the "Phase II" goals of 125-meter location capability may prove impossible in rural areas or where system configurations cannot deliver accurate information without significant dedicated expense,<sup>6</sup> this recognition must be made tangible by a clear statement that the Commission will exempt rural systems from any mandated E-911 requirements. At a minimum, RCA submits that the record clearly demonstrates that the application of the Agreement to rural areas is premature. Consistent with its stated position, RCA, on behalf of its members, reaffirms its proven willingness to work with local emergency service providers toward implementing feasible methodologies to promote public health and safety.

RCA concurs in the Agreement's conclusion that a cost recovery mechanism is needed to fund both carrier (wireless and wireline) and PSAP investment in E911 technology and cost of service. RCA notes, however, that the Commission's declaration that state or local fees assessed for the purpose of E-911 expense recovery are "not barred as a matter of law"<sup>7</sup> is no guarantee that such state or

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<sup>6</sup>/ Agreement at n. 8 and accompanying text.

<sup>7</sup>/ Agreement at p. 4.

local assistance will materialize. If the Commission mandates the provision of E-911, it should also adopt a federally-mandated cost recovery mechanism.

In summation, RCA submits that application of the Agreement to rural areas is technically infeasible, economically unsound and of questionable utility. RCA therefore urges the Commission to exempt rural areas from application of any federally-imposed E-911 standards.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I, Nicola A. Chenosky, hereby certify that a copy of the foregoing **Comments of the Rural Cellular Association** in CC Docket No. 94-102 was served on this 4th day of March 1996, by first class, U.S. mail, postage prepaid, to the parties on the attached pages.

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